

**From:** Aaron Sanders <[REDACTED]>  
**Sent:** Friday, September 23, 2022 12:58 PM  
**To:** esd.sm.WTCSite5  
**Cc:** Melva Miller; Laura Colacurcio  
**Subject:** Submission of Public Comment in support of 5 WTC  
**Attachments:** 5 WTC Public Comment, submitted by ABNY on 9.23.22.pdf

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Good afternoon,

My name is Aaron Sanders, Public Policy Director at ABNY. I am submitting a public comment on behalf of the organization regarding 5 WTC.

If you have any questions, please let me know.

Best,

Aaron Sanders  
Public Policy Director  
[REDACTED]



[www.abny.org](http://www.abny.org)

@ABetterNY





**PUBLIC COMMENT FROM THE ASSOCIATION FOR A BETTER NEW YORK SUBMITTED TO EMPIRE STATE DEVELOPMENT (ESD) REGARDING 5 WORLD TRADE CENTER**

Thank you for the opportunity to submit comments on behalf of the Association for a Better New York (ABNY). My name is Aaron Sanders, and I am the Public Policy Director for ABNY.

ABNY is a nonprofit organization dedicated to the advancement and support of New York City's people, businesses, and communities. We are a 50-year-old civic organization representing community stakeholders, including corporations, nonprofits, unions, government authorities, and educational, cultural, and health institutions. Our mission is to promote connections between the public and private sectors to make New York City a better place to live, work, and visit for all.

New York city's housing crisis is impacting the livelihoods of all New Yorkers but particularly low- and moderate-income New Yorkers. The creation of 5 World Trade Center is an integral step forward toward addressing the city's housing dilemma by providing much needed quality housing for New Yorkers. The building will provide approximately 1,200 residential rental units of which 25 percent, or approximately 300, would be permanently affordable. This development by itself would deliver five times the number of affordable homes produced across all of Lower Manhattan in a typical year. The affordable units are specifically reserved for low- and middle-income New York families who earn on average 50 percent of the Area Median Income will have access to securing housing. This opportunity will provide middle class families with safe and affordable housing. Additionally, the proposed 300 affordable units will be provided without any direct public subsidy or taxpayer dollars.

Moreover, 5 World Trade Center will provide support to the local economy. The development is projected to create 10,000 construction jobs and 1,900 permanent jobs, generating \$1.9 billion in economic output. This project will have a community impact. The building will feature an 11,000 square foot community space that will be programmed and operated by Educational Alliance, a community-based non-profit organization that has been serving downtown neighborhoods for more than 100 years

In closing, the project is crucial to the revitalization of Downtown Manhattan. Development there is essential to moving the area forward, as the site was significantly impacted by the September 11 terrorist attacks. As such, ABNY supports the creation of 5 World Trade Center.

Respectfully submitted,  
Aaron M. Sanders

[REDACTED]

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**From:** Alyce Russo <[REDACTED]>  
**Sent:** Sunday, October 16, 2022 9:03 PM  
**To:** esd.sm.WTCSite5  
**Subject:** Wtc 5 amendment comment

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Dear Empire State Development,

I have lived in Tribeca since 1992, I am writing to express my concerns for the development of WTC Site 5.

I sincerely hope WTC Site 5 Proposed Amendment can increase SUBSTANTIALLY affordable housing by increasing the percentage of affordable housing at the site and make sure that any retail is both practical and affordable for all of us downtown residents.

Respectfully,

Alyce Russo  
[REDACTED]

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[REDACTED]

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**From:** Amy Strassler Goldstein <[REDACTED]>  
**Sent:** Sunday, October 16, 2022 7:02 PM  
**To:** esd.sm.WTCSite5  
**Cc:** Matthew S Goldstein; Trevor Goldstein; William Goldstein  
**Subject:** A Downtown Resident's Comment on Proposed Amendment

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To the Lower Manhattan Development Corporation:  
and  
To the Empire State Development Corporation:

As a homeowner in the Financial District from right before the 9/11 attacks in 2001, I write to you to express my concerns and desires as you move forward with development of WTC Site 5.

I was in attendance at one of the first public meetings in 2002 to discuss what New Yorkers hoped for in terms of the destroyed World Trade Center site. Everyone wanted a site that would help to memorialize the lives lost on September 11, 2001, and people also expressed hope that the site could be a place where New Yorkers from every background could gather, work again, partake in arts and culture and live affordably.

I think in some ways our visions have come to pass, but as a resident of 55 Liberty Street, I have also seen the neighborhood become much less affordable to all New Yorkers in terms of both shopping and living. That is why I sincerely hope that in the WTC Site 5 Proposed Amendment you increase SUBSTANTIALLY the percentage of affordable housing that will be reserved at the site and make sure that any retail is also both practical and affordable for downtown residents.

As a public school teacher who worked at two schools within 5-15 minutes of the site, I have seen most of my younger colleagues priced out of the neighborhood. I also had three former students who had parents die on 9/11 while working at Windows on the World - these two siblings and their cousin are now grown and have children of their own. The idea that these apartments could be available for them and their young families at a rent they could afford would be a great way to show that New Yorkers take care of *our* own.

And finally as someone who has been fortunate enough to afford what is now a much more expensive apartment in the neighborhood, I have to say that if I were to move out of my building, I would happily pay for a comparably priced, market-rate apartment in WTC 5, and I would be HAPPY to have neighbors who were paying a more affordable rent. I would be even more happy to have the building become 100% affordable and see my neighborhood escape quickly becoming another Manhattan enclave of the wealthy and privileged.

My husband and I were able to raise our children here when the downtown community was more economically diverse, and we think it was a great place for our children to grow up. We would really like to see some more substantive and successful efforts to keep downtown a place for any New Yorker who wants to live there.

I look forward to hearing about your decision on the amendment and future development of the site.

Thank you for the opportunity to share my concerns.

Best,  
Amy Strassler Goldstein

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Amy Strassler Goldstein

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[REDACTED]

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**From:** Reynolds, Lucian (CB) <[REDACTED]>  
**Sent:** Monday, October 17, 2022 4:07 PM  
**To:** esd.sm.WTCSite5  
**Cc:** Jaiyesimi, Oluwatobi (ESD)  
**Subject:** Manhattan CB 1 Letter and Resolutions Regarding 5 WTC  
**Attachments:** 5 WTC Reso Package - Jan 22.pdf; 5WTC Letter\_07.2022.pdf

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Greetings,

Enclosed you will find our comments in the form of a letter and four resolutions from this year.

Kind regards,

Lucian Reynolds  
District Manager  
Manhattan Community Board 1  
[REDACTED]

COMMUNITY BOARD 1 – MANHATTAN  
RESOLUTION

DATE: JANUARY 25, 2022

COMMITTEE OF ORIGIN: LAND USE, ZONING & ECONOMIC DEVELOPMENT

COMMITTEE VOTE:	9 In Favor	0 Opposed	1 Abstained	0 Recused
PUBLIC VOTE:	0 In Favor	0 Opposed	0 Abstained	0 Recused
BOARD VOTE:	43 In Favor	0 Opposed	0 Abstained	0 Recused

RE: 5 World Trade Center Proposed Modified General Project Plan

WHEREAS: In February 2006 there was a Memorandum of Understanding (MOU) between the Lower Manhattan Development Corporation (LMDC) and the Port Authority, under which the Port agreed to provide parcels it owned at the center of the campus, including the original World Trade Center (WTC) tower footprints to the 9/11 Memorial & Museum and Performing Arts center, in exchange for Site 5 and adjacent parcels owned by LMDC; and

WHEREAS: In February 2019 there was an MOU between LMDC and Port Authority to jointly RFP Site 5 for either commercial (as of right) or mixed-use (required modification to the WTC General Project Plan). In June 2019 the Site 5 RFP was released; and

WHEREAS: In February 2021 there was conditional designation of a development team for a proposed project that would include a mixed-use development including: rental residential (with 25% permanently affordable units), office, 12,000 SF community facility space, amenity and fitness space, and retail. If the proposed mixed-use project is approved, LMDC would transfer Site 5 to Empire State Development (ESD), which would enter a long-term lease with the development team. Consistent with the 2006 MOU, all rent payments would go to the Port Authority as compensation for the 9/11 Memorial & Museum and Performing Arts Center sites; and

WHEREAS: In November 2021, LMDC and ESD Board approved the start of the public review process for the Modification to the WTC General Project Plan (MGPP) and Finding of No Significant Impact and Determination of Nonsignificance (FONSI), based on an Environmental Assessment (EA). A hearing was held on January 12, 2022 on the MGPP and the FONSI/EA, and written comment is being accepted until February 15, 2022; and

WHEREAS: There will be additional opportunity for public comment on the proposed project. In Spring 2022 there will be additional LMDC and ESD Board meetings to consider public comments on the MGPP and FONSI, to take action on the MGPP and FONSI, and to take initial action and authorize a public hearing on the real

estate transactions related to LMDC and ESD site dispositions. The third LMDC and ESD public Board meetings will take place in Spring/Summer 2022 to take action on the real estate transactions. Additionally, since ESD is a public entity it is subject to the Public Authorities Control Board (PACB), and ESD will make an application to the PACB and there will be associated public meetings; and

WHEREAS: The approved General Project Plan was for commercial use only, and the MGPP includes a greater flexibility in use, commercial use, mixed-use residential development, permanent affordable housing, pedestrian bridge/connection to liberty park, and community facility space. The MGPP also includes proposed Mixed-Use Design Guidelines. This resolution serves as Manhattan Community Board 1's (CB1) comment specifically on the MGPP; and

WHEREAS: CD1 is one of the fastest growing residential communities in all of New York City. The population of New York City increased 3% from 2000 to 2020. Comparatively, Community District 1's (CD1) population increased 128% during the same time period, from 34,420 in 2000 to 78,390 in 2020 (U.S. Census); and

WHEREAS: CD1 urgently needs an increase in civic infrastructure such as community-based facilities, amenities, retail, senior facilities and accessible healthcare providers. This need is already critical, and will only increase with an influx of new residents associated with this project; and

WHEREAS: For instance, CD1 only has 3 full-size gymnasiums among 11 schools, and the demand for these existing spaces is excessive; and

WHEREAS: CD1 is also in great need of facilities and amenities that serve the senior population, and specifically spaces for seniors to be active; and

WHEREAS: CD1 has steadily lost affordable retail that serves the residential community and has become saturated with higher end retail. Community-based retail is a critical need among the community, and specifically affordable grocery stores; and

WHEREAS: In December 2021, CB1 adopted a resolution supporting 100% affordable housing at the 5WTC site; and

WHEREAS: There is tremendous potential surrounding this project, and it is one of great symbolic importance as the World Trade Center Complex comes to completion. There should be a comprehensive approach towards this project, as one that is both state-of-the-art and which aims to improve the community fabric of the surrounding neighborhood; now

THEREFORE  
BE IT  
RESOLVED  
THAT:

While CB1 generally supports and favors a mixed-use development as opposed to a strictly commercial development, concerns have been expressed by CB1 members and members of the public over the project as currently proposed via the MGPP. As LMDC and ESD move into the next stage of this process and consider public comment and modifications to the MGPP, we urge that they take the following points under careful consideration:

- Community facility space of only 13,000 SF is woefully insufficient in the context of the scale of this project. The MGPP should be modified to increase the size of the community facility space.
- Uses for the community facility space should prioritize those that are desperately lacking among our community, such as full gymnasium space that can be used both by children and seniors and/or senior facilities and amenities.
- The MGPP should incorporate the design of a building core that works with the integration of a larger community facility that could integrate gymnasiums as part of that community facility.
- The MGPP should specify this community space as “usable” square footage to protect from space being whittled out for mechanical purposes or other uses, as we have experienced with other projects within CD1.
- CB1 believes that rather than commercial/office space, greater retail space is needed. Specifically, retail that is affordable and geared towards serving the existing and growing residential population (e.g. grocery stores), and including local small businesses/mom and pop stores.
- The proposed mixed-use design guidelines states that, “the word ‘shall’ is always mandatory and not discretionary. The word ‘may’ is permissive.” CB1 urges that the MGPP mixed-use design guidelines be amended to change all “shall” provisions to “may” provisions, so that they operate as actual “guidelines” rather than locking in design requirements that are prohibitive towards maximizing affordable housing and community uses. This would also allow for maximum flexibility in architectural innovation.
- The MGPP and mixed-use design guidelines should provide more clarity on, and prioritize outdoor plaza space, seating, trees, sidewalks, roof usage, provisions for outdoor farmers markets that serve the residential community, etc.
- The MGPP must include that the building and surrounding areas are 100% ADA compliant and accessible for those with restricted mobility.
- The MGPP should provide greater clarity on, and prioritize building resiliency and green infrastructure (including the potential for a net-positive building). This includes bird-safe glass and design measures.
- CB1 would like to have a community charrette/workshop to discuss and further vet the allocation and programming of the non-residential spaces of the building, which we see as a great opportunity for the building to be tailored to the unique Lower Manhattan context.

COMMUNITY BOARD 1 – MANHATTAN  
RESOLUTION

DATE: JANUARY 25, 2022

COMMITTEE OF ORIGIN: ENVIRONMENTAL PROTECTION

COMMITTEE VOTE:	9 In Favor	0 Opposed	0 Abstained	0 Recused
PUBLIC VOTE:	0 In Favor	0 Opposed	0 Abstained	0 Recused
BOARD VOTE:	41 In Favor	0 Opposed	0 Abstained	0 Recused

RE: 5 World Trade Center Finding of No Significant Impact (FONSI)/Environmental Assessment (EA)

WHEREAS: In November 2021, Lower Manhattan Development Corporation (LMDC) and Empire State Development (ESD) Boards approved the start of the public review process for the Modification to the WTC General Project Plan (MGPP) and Finding of No Significant Impact and Determination of Nonsignificance (FONSI), based on an Environmental Assessment (EA). A hearing was held on January 12, 2022 on the MGPP and the FONSI/EA, and written comment is being accepted until February 15, 2022; and

WHEREAS: In April 2004, LMDC prepared in cooperation with the US Department of Housing and Urban Development (HUD) and the Port Authority of New York and New Jersey (Port Authority), a Final Generic Environmental Impact Statement (2004 FGEIS) for the World Trade Center (WTC) Memorial and Redevelopment Plan; and

WHEREAS: The Site 5 EA<sup>1</sup>, published in 2021, was prepared with up-to-date information pursuant to the National Environmental Policy Act (NEPA) and the State Environmental Quality Review Act (SEQRA) and considers any new potential environmental impacts of the proposed amendment to permit the development of a mixed-use residential tower at Site 5. The EA generally follows the methodology recommended by NYC's City Environmental Quality Review (CEQR) Technical Manual, as applied to the specific uses and conditions of the WTC site and surroundings; and

WHEREAS: The EA follows both state and federal guidelines because LMDC used federal funds (HUD Block Grant), to demolish and remediate Site 5; and

WHEREAS: The Site 5 EA analyzes the potential new environmental impacts resulting from the proposed change of use from commercial to mixed use, and studies various categories which were previously analyzed in the 2004 FGEIS including shadows, hazardous materials, air quality, natural resources, and traffic; and

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<sup>1</sup> [http://renewnyc.com/attachments/content/meetings/20211210\\_WTCMemorialAndRedevelopmentPlan.pdf](http://renewnyc.com/attachments/content/meetings/20211210_WTCMemorialAndRedevelopmentPlan.pdf)

WHEREAS: The EA resulted in a Finding of No Significant Impact (FONSI)/Determination of Non Significance, meaning that the proposed change from commercial to mixed use does not present any new adverse environmental impacts to the project; and

WHEREAS: Manhattan Community Board 1 (CB1) made several requests, both through the 5WTC Community Advisory Council (CAC) and via a letter to ESD (date of letter) , for technical experts who worked on the EA to attend the December 2021 Environmental Protection Committee meeting to “present fully on the Environmental Assessment process, give a brief overview of the findings of the Environmental Assessment, and to answer questions live during the meeting.” While ESD technical experts did attend the meeting, a presentation was not given on the EA itself, but rather on the public approvals process. CB1 members expressed that they did not feel equipped to discuss or comment on the EA without having a full presentation and discussion on each category of findings, including categories identified as having a significant adverse impact in the 2004 FGEIS. ESD also declined to attend the January 2022 CB1 Environmental Protection Committee meeting to present specifically on the environmental impacts of the project; and

WHEREAS: While CB1 supports a mixed-use development rather than the originally proposed commercial building, there are significant environmental concerns related to this project, and more clarity is needed on the different studies that have been conducted, identifying updated information from the 2004 FGEIS, and all current findings updated into current potential impacts to the community; and

WHEREAS: Although the Site 5 EA states that the impacts of the currently approved plan for a commercial/office tower at 5 World Trade Center (5 WTC) were studied in the 2004 Final Generic Environmental Impact Statement (2004 FGEIS), in fact, that is not the case, at least as to construction impacts. The 5 WTC commercial/office tower concept was modified in a 2007 amendment to the WTC General Project Plan (GPP). With respect to Site 5, the 2004 FGEIS analyzes construction environmental impacts solely with respect to demolition activities of the former Deutsche Bank Building, and does not take account of construction activities for any building to be built on Site 5; and

WHEREAS: Although an Environmental Assessment was prepared in 2005 (2005 EA), which may have addressed construction activities at Site 5, the 2005 EA is not available on the LMDC website or otherwise readily publicly available, so CB1 is unable to assess the relevance of the 2005 EA; and

WHEREAS: The 2004 FGEIS identified a number of negative impacts on residents in the vicinity of the WTC site for the construction activities addressed in the 2004 FGEIS and indicated that a number of mitigation measures would be taken; and

WHEREAS: When the WTC campus plan was approved, it was anticipated that all of the associated construction would occur in a much more compressed period of time, rather than over the course of twenty years. The impacts of construction at Site 5

may have been anticipated to be marginal as part of a larger, campus-wide project, but today is a very different scenario as a major stand-alone project. The community surrounding Site 5 has endured construction impacts in this highly dense area for over twenty years, and there is major concern over how this construction will impact residents in close proximity and what mitigation measures will be implemented; and

WHEREAS: Community District 1 (CD1) is a highly dense neighborhood which has lost increasingly more open views of the sky. The building at Site 5 will be tall and cast significant shadows, and CB1 has major concerns over the impact of shadows on the site; and

WHEREAS: Concerns over infrastructure impacts have also been raised, as CD1 is already lacking in community and civic infrastructure to support a population that has grown 124% from 2000 to 2020 (U.S. Census Bureau). Additional residents in connection with this project will only add strain, and there will be radiating impacts on schools, subways, streets, sidewalks, etc. Further discussion is needed on those specific impacts and mitigation; and

WHEREAS: There are social and economic impacts that are not captured as part of the existing environmental analysis. ESD representatives have confirmed that the 2004 FGEIS and 2021 EA analyses do not require evaluation of wider social and economic impacts, and further discussion and consideration is required; and

WHEREAS: There are major traffic implication concerns in connection with this project. There are few functioning streets for vehicular, cyclist and pedestrian circulation in the area surrounding Site 5. With hundreds of new residential apartments, commercial, retail, and community facility space, the project will undeniably generate many new vehicular, cyclist and pedestrian trips coming into and going out of the area; including black cars, personal cars, deliveries, UPS, etc. These specifics have not yet been presented to the CB, and more discussion and consideration is needed; and

WHEREAS: There are specific traffic implication concerns related to the construction that will take place. The street network surrounding Site 5 include: Greenwich Street (Southbound), Washington Street (Southbound), Rector Street (Eastbound), Cedar Street (Westbound), Albany Street (Eastbound), Edgar Street (both East and West bound for one block into the garage), Thames Street (not for cars), Carlisle St (Westbound from Greenwich Street), and Morris Street (not a through street). When construction starts Albany, Greenwich and Cedar Streets will be impacted. Cedar street will be the only westbound street since we cannot get Liberty Street reopened to vehicles, and if Edgar Street is closed in connection with the school at the bottom of Greenwich Street. This will create serious circulation issues, including for emergency vehicle access; and

WHEREAS: CB1 has questions and concerns regarding the original and foundational 2004 FGEIS for the entire WTC campus, including what components may be outdated

and require supplemental investigation and updates as it pertains to the new development at Site 5, now after 18 years. For instance, the realities of climate change and resiliency are dramatically different in 2022 than they were in 2004. The community must have assurance that all new environmental impacts have been carefully considered and incorporated into the current plans; now

THEREFORE  
BE IT  
RESOLVED

THAT: While this EA resulted in a FONSI/Determination of Nonsignificance, it is indisputable that this major project will have a ripple effect of impacts among the community. The 2004 FGEIS and 2021 EA studies are extensive, but NEPA and SEQRA quantitative guidelines are inherently limiting and do not capture the actual, comprehensive impact to a community; and

BE IT  
FURTHER  
RESOLVED

THAT: CB1 urges ESD to hold a dedicated meeting with CB1 to review environmental impacts related to this project, including a full presentation of findings from the 2004 FGEIS and the 2021 EA in the categories of: Land Use, Zoning & Public Policy; Urban Design and Visual Resources; Historic Resources; Open Space; Shadows; Community Facilities and Services; Socioeconomic Conditions; Neighborhood Character; Hazardous Materials; Water and Sewer Infrastructure and Solid Waste Services; Transportation; Air Quality; Climate Change; Noise; Coastal Zone Consistency; Natural Resources; Environmental Justice; Public Health; and Construction- as well as all mitigation measures identified in the 2004 FGEIS and any subsequent EA that would be relevant to development at Site 5 be identified and implemented by ESD; and

BE IT  
FURTHER  
RESOLVED

THAT : This meeting is crucial in ensuring that the community understands the real impact of this project, to review in greater detail the 2004 FGEIS, components that may be outdated or were not updated via the 2021 EA, and which areas may need supplemental study in order to be updated, and to evaluate real-world impact and mitigations that were not captured in the existing environmental studies.

COMMUNITY BOARD 1 – MANHATTAN  
RESOLUTION

DATE: JANUARY 25, 2022

COMMITTEE OF ORIGIN: YOUTH & EDUCATION

COMMITTEE VOTE:	9 In Favor	0 Opposed	0 Abstained	0 Recused
PUBLIC VOTE:	0 In Favor	0 Opposed	0 Abstained	0 Recused
BOARD VOTE:	34 In Favor	2 Opposed	6 Abstained	1 Recused

RE: Recreation Space for Lower Manhattan

WHEREAS: Five World Trade is a major project that has been in the works for many years; and

WHEREAS: It has been discussed by developers who were not chosen to build Five World Trade that they could facilitate a field house at the location. They proposed gymnasiums operated by community groups. The proposal would allow access for all ages; and

WHEREAS: The proposal included the Downton Soccer League, Downtown Little League and Manhattan Youth. These three organizations provide recreation activities for a large percentage of our neighborhood youth; and

WHEREAS: Of the nine schools in our community board only three have full-size gyms. Often these gyms are shared between a middle and elementary school in the same building; and

WHEREAS: The new PS 150 School was promised a full sized gym but that has been eliminated much to the displeasure of the community; and

WHEREAS: The proposal to build a field house/gym at 5 World Trade included approximately 60,000 square feet of space; and

WHEREAS: In past years planning for facilities has been initiated by Community Board One. CB 1 has been successful in developing Battery Park City's facility, The Downtown Community Center and all of the school buildings South of Canal Street; and

WHEREAS: We fully expect Lower Manhattan to grow over the next ten years and currently there is no plan to develop another gym or field. Youth of New York City demand a healthy lifestyle and physical activity is critical for adolescents; and

WHEREAS: It is City Planning's goal to have 2.5 acres per 1000 residents and yet Lower Manhattan has but 20-38% of that; and

WHEREAS: Wagner Park will be under construction for the upcoming years, removing the small amount of open space we have; now

THEREFORE

BE IT

RESOLVED

THAT: Manhattan Community Board 1 asks that Five World Trade Center contain a field house and full size regulation gym to accommodate the growing population of ages.

COMMUNITY BOARD 1 – MANHATTAN  
RESOLUTION

DATE: JANUARY 25, 2022

COMMITTEE OF ORIGIN: QUALITY OF LIFE & SERVICE DELIVERY

COMMITTEE VOTE:	8 In Favor	1 Opposed	0 Abstained	0 Recused
PUBLIC VOTE:	2 In Favor	0 Opposed	0 Abstained	0 Recused
BOARD VOTE:	38 In Favor	1 Opposed	4 Abstained	0 Recused

RE: 5 WTC Affordability Amidst the Greater Context of Unaffordability in Lower Manhattan

WHEREAS: To supplement CB1 resolution of December 2021 supporting 100% affordability at 5 WTC, to address the impact of the proposed plan for luxury housing at 5WTC on the community; and

WHEREAS: Since 9/11/2001, the vast majority of housing that is built in the district has been market rate, luxury buildings, with only a token percentage, if any, of temporarily affordable units offered; and

WHEREAS: The increase in luxury housing has led to the loss of a large number of its once affordable units as landlords and owners have taken advantage of rising prices to convert to market-rate, and 421-g and other tax abatements have expired, including but not limited to three 39-story buildings in Independence Plaza; Gateway Plaza, where the quasi-rent stabilization protection for approximately 600 out of 1,700 units permanently ends in less than 8 years; ; and Southbridge Towers, which opted to transition to market rate Cooperative buildings; alone; and

WHEREAS: Additionally, at Tribeca Point, where quasi-rent stabilization for 270 out of 340 apartments has been allowed to expire this means that although these tenants would pay market-based rents when they first moved into the building, increases above that baseline would be limited to those allowed by the City's Rent Guidelines Board for the apartments it regulates, usually limited to less than two percent; and

WHEREAS: This quasi-rent stabilization can provide a crucial protection for middle-class tenants, who can generally afford the rents prevailing at the outset of a lease, but are often later forced from their homes by the gyrations of the New York real estate market. For context, the net effective median rent for New York City as a whole rose 22.8 percent in November (compared to the same period a year earlier), and many landlords have responded to the real estate market's recent bounce back by demanding increases of between 50 and 70 percent.  
<https://www.ebroadsheet.com/the-broadsheetdaily-1-12-22-at-41-river-terrace-aff>

[ordability-provisions-extended-for-low-income-residents-but-not-for-middle-income-renters/](#)); and

- WHEREAS: The loss of this affordable housing impacts low- and moderate and middle income residents -including 9/11 survivors, adult children raised here, and the seniors, who have built and rebuilt this community, after 9/11 and cannot afford double digit percentage increases in their rent; and
- WHEREAS: The combination of planning and zoning decisions favoring “Big Real Estate” and exorbitant rents and housing costs have in effect rendered Community Board 1 a segregated community. Based on the 2020 US Census numbers, the Non Hispanic White population as a share of the overall population of NYC is up by down while the same population increased its share of the overall population of Community District 1’s census geographies; and
- WHEREAS: People Of Color will not benefit from the current LMDC plan. African American, Hispanic and/or Indigenous peoples and many 9/11 Survivors are not receiving equal benefit of or access to 9/11 related redevelopment despite equal exposure to 9/11 related toxins and equal loss of health, property and sometimes life. We not only need “affordable” housing, in general, we need more housing that’s specifically and genuinely affordable for people of color and 9/11 Survivors & 1st Responders at large; and
- WHEREAS: Affordable housing is needed for “public-facing” workers critical to the health and education of our community, and the success of our businesses. According to a recent study sponsored by the Real Estate Board of New York, which found that 500,000 units of new housing are needed in the City by 2030: “Without affordable housing located within and proximate to job centers, critical workers suffer from higher rents and longer commutes, and residents suffer higher costs for important services.”; and
- WHEREAS: Funding mechanisms to build and maintain 100% affordability exist but have not been fully explored by LMDC and could include a federal allocation of Project-Based Section 8 funding - which is different than the Section 8 voucher program, special Congressional appropriation, or 501(c) (3) bonds with Section 8 and a smaller appropriation.; and
- WHEREAS: These funding mechanisms, such as Project-Based Section 8 funding, are exemplified by projects such as Manhattan Plaza in Hell’s Kitchen, with 1,689 mixed “affordable” income units, and is successful and proven to be financially and socially sustainable since 1977; and
- WHEREAS: CB1 has committed to identify and root out systemic racism in our community and supports/sees this integrated “affordable-socio-economic” model as a big step in this direction; and

WHEREAS: Fear based, segregationist arguments such as the suggestion that if residents are subsidized, the neighborhood will become dilapidated are the same ones the United States rejected as racist, classist and unconstitutional in 1965 and CB1 continues to reject these arguments; and

WHEREAS: The World Trade Center is a unique site with billions of dollars received in subsidies by developers for the commercial buildings. The one residential building on this historic site must be 100% affordable housing as a reflection of the sacrifice of so many on that day. 5WTC is and must be developed as a symbol of the resilience of all the people of this diverse city; and

WHEREAS: CB1 community offers great resources - which include public schools, parks, waterfront, good access to transportation, which must be available to and inclusive of a diversity of races, classes and income levels; and

WHEREAS: The current design guidelines proposed by the LMDC include mandatory design requirements, such as rounded glass corners, that would cause the building to be unnecessarily expensive and thus negatively impact the ability to build a well-designed but affordable building at the site; and

WHEREAS: The LMDC has failed to create affordable housing in Lower Manhattan; and

WHEREAS: LMDC funding was to benefit the area impacted by the terrorist attacks of 9/11; and

WHEREAS: The Community made clear from inception that affordable housing was its #1 priority for rebuilding; and

WHEREAS: Site 5 WTC is public land purchased with public HUD funds and should be used for the benefit of the public; and

WHEREAS: The addition of more Luxury housing will lead to less housing diversity in CB1 community<sup>2</sup>; and

WHEREAS: With 1,140 newly built luxury condominium apartments remaining unsold and unoccupied as of December 15, 2021<sup>3</sup>, Lower Manhattan has a drastic surplus of market rate/unaffordable homes and an urgent deficit of affordable homes. There is no need nor desire for 1000 or more units of luxury rental apartments in this community; and

WHEREAS: As NYC is moving towards meeting the goals of the Climate Leadership and Community Protection Act, 5 WTC should be built using state-of-the-art Net-Positive plus 33 and Sustainable Urban Development standards, producing

---

<sup>2</sup> <https://www1.nyc.gov/site/hpd/services-and-information/area-median-income.page>

<sup>3</sup> <https://marketproof.com/reports/financial-district-new-developments-pick-up-momentum-december-2021>

enough energy to maintain itself, plus 33% more energy to be shared/sold with the immediate community, thereby mitigating the costs of long-term maintenance of the structure, committing to global and local climate initiatives, and local social sustainability, equity and diversity; now

THEREFORE

BE IT

RESOLVED

THAT: The current LMDC plan for 5 WTC , which does not guarantee anything more than 25% of the 1,300 units be affordable, does not meet the needs of CB1 or the greater New York community, and 1,000 units of market-rate housing will further the huge existing gaps in both racial and economic diversity in our area; and

BE IT

FURTHER

RESOLVED

THAT: The LMDC explore all options and create a residential plan that includes 100% of the units are affordable with a range from the deepest through moderate/middle incomes, that will provide for a socially and economically integrated community and will be financially sustainable. The LMDC plan should reflect equity, inclusion, access and genuinely affordable housing consistent with and representative of the diversity of the 9/11 Community and of the City we've helped to revive after 9/11.



**The City of New York**  
**Manhattan Community Board 1**  
Tammy Meltzer CHAIRPERSON | Lucian Reynolds DISTRICT MANAGER

July 19, 2022

Kevin S. Law  
Chair, Board of Directors  
Empire State Development Corporation  
633 Third Avenue  
New York, NY 10017

Holly Leicht  
Chair, Lower Manhattan Development Corporation  
22 Cortlandt Street  
New York, NY 10007

Dear Mr. Law, Ms. Leicht:

I write today regarding unanswered questions that I implore your Boards to consider during the scheduled board meetings of the Lower Manhattan Development Corporation (LMDC,) and the Empire State Development Corporation (ESD.) As you know, Manhattan Community Board 1 has been heavily engaged on this project and has held several meetings and authored a Resolution in support of the community's numerous questions about the project. Unfortunately, many questions remain unanswered and requests unresolved, and we respectfully request the directors of your respective Boards delay any voting on formally moving the project forward until the questions are answered and requests resolved.

With regards to the subjects you are voting on today, affordability and the community facility space, CB 1 asks for the members of your Boards to not settle for such low floors. The 25% floor for income-restricted housing is paltry. Public land that is developed to the proposed density should yield far more than 300 units of affordable housing against the estimated over 900 market-rate units. Furthermore, the community space is not optimally sited within the building and should have far more usable floor area. In our January 2022 resolution about 5 WTC affordability we wrote:

The current LMDC plan for 5 WTC , which does not guarantee anything more than 25% of the 1,300 units be affordable, does not meet the needs of CB1 or the greater New York community, and 1,000 units of market-rate housing will further the huge existing gaps in both racial and economic diversity in our area.

Manhattan Community Board 1, and the Lower Manhattan community deserve this information before the directors put into motion the approval process for the 5 World Trade Center (5WTC) project. In our January 2022 resolution responding to the Finding of No Significant Impact (FONSI)/Environmental Assessment (EA), we requested the following:

CB 1 urges ESD to hold a dedicated meeting with CB1 to review environmental impacts related to this project, including a full presentation of findings from the 2004 FGEIS and the 2021 EA in the categories of: Land Use, Zoning & Public Policy; Urban Design and Visual Resources; Historic Resources; Open Space; Shadows; Community Facilities and Services; Socioeconomic Conditions; Neighborhood Character; Hazardous Materials; Water and Sewer Infrastructure and Solid Waste Services; Transportation; Air Quality; Climate Change; Noise; Coastal Zone Consistency; Natural Resources; Environmental Justice; Public Health; and Construction- as well as all mitigation measures identified in the 2004 FGEIS and any subsequent EA that would be relevant to development at Site 5 be identified and implemented by ESD;

While a meeting was held in response to this request, the leadership of the board was told by the individuals who attended the meeting on behalf of ESD that they were not prepared to provide the information that was sought regarding the EA as it related to the 2004 FEIS.

CB 1 does not consider this request fulfilled. As an alternative, we would be willing to send the questions in writing to ESD so that the right experts can consider the questions and provide fulsome answers, if that format would yield the important information that we are seeking. Regardless, we do not believe that either board of directors should vote to allow this project to proceed until this request is honored with complete information.

CB 1 has worked with LMDC since its inception post-9/11. This is the final closing act and in many ways, the action by which the people of New York City will remember it. I urge you to reject any agreement with such low minimums of affordability and public benefits that don't serve your namesake community to the fullest extent.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Meltzer", with a long horizontal flourish extending to the right.

Tammy Meltzer, Chairperson

cc: Brian Kavanagh, State Senator  
Jerold Nadler, Member of Congress  
Yuh-Line Niou, State Assembly Member  
Mark Levine, Manhattan Borough President  
Christopher Marte, City Council Member  
Daniel Ciniello, President, Lower Manhattan Development Corporation  
Francisco Polanco, Director of Community Relations, Empire State Development  
Tobi Jaiyesimi, Senior Project Director, Empire State Development

[REDACTED]

---

**From:** Allerton, Conor <[REDACTED]>  
**Sent:** Monday, October 17, 2022 5:51 PM  
**To:** esd.sm.WTCSite5  
**Cc:** Marte, Christopher  
**Subject:** Council Member Marte Comment on WTC GPP Site 5 - 2022-10-17  
**Attachments:** CM Marte Letter to ESD re 5WTC GPP - 2022-10-17.pdf

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Good afternoon,

Please see attached a letter from Council Member Christopher Marte regarding the amendment to the World Trade Center General Project Plan to allow residential use at Site 5. Please regard this letter as official comment from the Council Member during this comment period ending today.

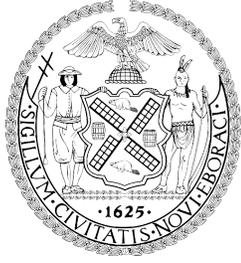
Please let me know if you have any questions.

Thank you,  
Conor

**Conor Allerton** (he/him)  
Director of Land Use and Housing  
Office of Council Member Christopher Marte  
District 1 - Lower Manhattan  
[REDACTED]

---

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# Christopher Marte

紐約市市議員馬泰 Council Member, District 1

district1@council.nyc.gov  
(212) 587-3159

65 East Broadway  
New York, NY 10002

October 17, 2022

Hope Knight  
President, CEO, and Commissioner, Empire State Development Corporation  
633 Third Avenue, 37th Floor  
New York, NY 10017

**Subject: Comments on the World Trade Center Memorial and Cultural Program General Project Plan, Site 5**

Dear Commissioner Knight,

I write to provide my comments on the most updated proposal for Site 5 as it relates to the World Trade Center Memorial and Cultural Program General Project Plan (“GPP”). My perspective is shared by and reflective of widespread community opinion on the potential for this site to directly address the affordable housing crisis New York City and State are facing.

The GPP was first developed after September 11, 2001 to redevelop the World Trade Center, and has since been amended several times. In April 2022, an amendment was proposed to change the use of Site 5 from entirely commercial to a mix of residential, commercial, and community facility uses. The current proposal includes 1.1 million residential square feet, with 25 percent of units slated to be permanent affordable housing. Amendments like this are critical in responding to a changing landscape in Downtown Manhattan, and changing needs for economic development and affordable housing.

However, as this amendment is reviewed by local and state stakeholders and agencies, the opportunity to maximize the potential affordability on this site must be seized. Building entirely affordable housing on a public site as recognizable as the World Trade Center would symbolize our commitment to ending this affordable housing crisis.

In an official recommendation letter dated February 14, 2022, the City Planning Commission writes:

*“The Commission encourages the State, the City and the other stakeholders, to continue to work together in the upcoming months on the other elements that will constitute the second phase of the proposed amendment, such as the amount of affordable housing.... The Commission*

*acknowledges that the proposed inclusion of permanently affordable new housing on this site is crucial to the equitable and sustainable growth of the City and supports efforts to deliver this goal.”*

It is clear that community collaboration to achieve such crucial affordability is a shared goal among the City, State, and local stakeholders. A feasibility study has already been drafted signaling a practical pathway to achieving full affordability on Site 5, which has gained significant interest from State officials.

I strongly urge you to consider this opportunity and to reject the amendment as proposed. The final piece of the World Trade Center plan can achieve what New York desperately needs, and serve as a promise to New Yorkers that they have a right to a home they can afford.

Sincerely,

A handwritten signature in black ink, appearing to read 'Christopher Marte', with a stylized, cursive script.

Christopher Marte  
New York City Council Member

[Redacted]

**From:** Erik Botsford (DCP) <[Redacted]>  
**Sent:** Thursday, October 13, 2022 6:30 PM  
**To:** Jaiyesimi, Oluwatobi (ESD)  
**Subject:** WTC Site 5 - CPC letter to ESD  
**Attachments:** 10.12.22 Letter to Hope Knight re Comments on the WTC Memorial and Cultural Program General Project Plan Site 5 Phase II.pdf

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Hi Tobi –

Attached please find the final signed letter from the City Planning Commission regarding the Phase II amendment to the WTC GPP. This will be made available on the Department of City Planning website shortly.

Please feel free to reach out if you have any questions.

Thank you,  
Erik

**Erik Botsford**  
Deputy Director • Manhattan  
(he/him/his)

[Redacted]



CITY PLANNING COMMISSION  
CITY OF NEW YORK

OFFICE OF THE CHAIR

October 12, 2022

Hope Knight, President and CEO-designate  
Empire State Development Corporation  
633 Third Avenue, 37th Floor  
New York, NY 10017

**RE: Comments on the World Trade Center Memorial and Cultural Program General Project Plan Site 5, Phase II**

Dear Ms. Knight,

The City Planning Commission (the “Commission”) has reviewed the proposed Site 5, Phase II amendment to the World Trade Center Memorial and Cultural Program General Project Plan (“WTC GPP”) issued by the New York State Urban Development Corporation d/b/a Empire State Development (“ESD”).

The WTC GPP was established to create a plan to redevelop the World Trade Center (“WTC”) campus after the attacks of September 11, 2001. The plan provides for commercial towers, public open space, a performing arts center and cultural uses, and a 9/11 memorial. The WTC GPP is subject to Commission review pursuant to the provisions of Subdivision 3 of Section 16 of the New York State Urban Development Corporation Act, which provides that a planning board or commission may recommend approval, disapproval, or modification of a general project plan, whenever such plan requires the override of local law or regulation for implementation.

The WTC GPP’s Site 5 is located at 130 Liberty Street on the southernmost edge of the WTC campus. On February 14, 2022, the Commission approved an amendment to Phase I that expanded the permitted uses on the site to include the option of a mixed-use tower with residential and community facility uses, in addition to the previously authorized commercial office and retail uses. The Phase II amendment currently before us proposes to override of the Zoning Resolution (“ZR”) and other local laws with respect to floor area and open space regulations, height and setback controls, signage and ground floor regulations. Phase II also proposes a building design and site plan that is consistent with the Design Guidelines of the WTC GPP.

The goal of the Phase II amendment is to facilitate the redevelopment of Site 5 as an approximately 940-foot tall, 1.3 million square-foot mixed-use building. The mixed-use building will have commercial and retail uses, a minimum of 10,000 square feet of community facility use, and up to 1.1 million square feet of residential use. Site 5 will also include a public lobby and second floor connection to the community facility space that is located on the third floor, and a private driveway with an 8-foot sidewalk that connects Greenwich Street and Washington Street. The WTC GPP requires that a minimum of 25 percent of the residential units developed as part of the project be targeted to households earning at or below 50 percent AMI. Of those 25 percent of units, at least 10 percent of the units need to be rented to households

Daniel R. Garodnick, Chair  
City Planning Commission  
120 Broadway, 31<sup>st</sup> Fl. - New York, N.Y. 10271-3100  
(212) 720-3200  
[www.nyc.gov/planning](http://www.nyc.gov/planning)

earning at or below 40 percent AMI. Lastly, an additional 10 percent of units will be for households earning at or below 60 percent AMI. The project proposes to develop approximately 1,200 rental units where approximately 300 units will be permanently affordable housing. The affordable housing would be regulated by the New York State Division of Housing and Community Renewal pursuant to a regulatory agreement with the New York State Housing Finance Agency.

The Phase II amendment proposes several overrides of the ZR including provisions from the Special Lower Manhattan District. Specifically, it includes (a) increasing the maximum residential floor area ratio (FAR) from 10.0 to 15.0 without providing a bonusable element and without regard to floor area that is attributable to improvements on other portions of the project site such as the cultural sites; (b) increasing the maximum base height permitted to approximately 190 feet; (c) increasing the maximum horizontal dimension to exceed the permitted 175 feet; (d) waiving the minimum 20-foot setback requirement (e) decreasing the required minimum pedestrian circulation space from 4,638 square feet to 1,055 square feet; (e) waiving curb cut requirements that prohibit a curb cut on Greenwich Street to allow for one 12-foot curb cut; (f) increasing the maximum permitted lobby width from 33.75 linear feet to provide for a maximum lobby width of 75 linear feet; (g) waiving loading berth requirements to allow for a loading berth to begin from 35 feet from the intersection of Washington Street and Albany Street instead of 50 feet; (h) allowing for retail glazing to be measured from 2 feet to 14 feet instead of being measured from the floor to the height of the ceiling or 14 feet above grade, whichever is less; and (i) waiving signage requirements that are not consistent with the WTC Design Guidelines.

This letter serves as a response to the Empire State Development Corporation's (ESD) request for a recommendation from the Commission in relation to the WTC GPP Site 5 Phase II modifications. The Commission supports the overarching goals of the WTC GPP to appropriately develop the various sites and is pleased to see efforts continue to progress. The Commission believes that the zoning overrides that support the building's mass and bulk, and some of the overrides that create the ground floor experience, are appropriate in the context of the WTC Campus and the surrounding neighborhood. The Commission also supports the inclusion of affordable housing on site and encourages ESD to continue to explore ways to increase the number of permanently affordable units.

The Commission recognizes the ongoing dialogue between the project team at ESD and the staff at the Department of City Planning (DCP). The Commission appreciates the efforts that ESD has made to address DCP's concerns over the zoning overrides which include waivers for the pedestrian circulation space, curb cuts, and the design of the public spaces at Site 5. While the Commission supports the project and the exercise of ESD's statutory authority, the Commission strongly urges ESD to consider and address the following concerns with the project's design.

#### Pedestrian Circulation Space

The Commission encourages ESD to greatly increase the amount of pedestrian circulation space to support a better pedestrian experience. Zoning requirements for pedestrian circulation space are intended to enhance the vibrancy and quality of life in Lower Manhattan through the provision of more generous sidewalks and supplemental privately-owned public spaces on development sites. The proposed waiver of pedestrian circulation space requirements would result in a 77 percent reduction of the required pedestrian circulation space (1,055 square feet proposed vs. 4,638 square feet required). The Commission appreciates that the proposed pedestrian circulation space along Greenwich Street and some of Albany Street would widen portions of the sidewalk by three feet. However, a more significant pedestrian circulation space that meets the existing ZR requirements would provide an opportunity to create quality public spaces that would serve the residents of the proposed development, the broader community, workers, and visitors.

#### Private Driveway

The Commission urges ESD to reconsider the private vehicular driveway and associated curb cuts on both Greenwich Street and Washington Street that provide exclusive access for residents of the building. The development should prioritize pedestrians and reinforce the walkable context of the surrounding neighborhood. The Commission appreciates that gestures have been made in response to DCP comments on the driveway by adding a second sidewalk adjacent to Liberty Park. However, the Commission continues to question the need for this exclusive vehicular drop off area in the heart of one of New York City's most transit-rich areas. Lower Manhattan is a walkable neighborhood, and the inclusion of the driveway will be disruptive to the pedestrian experience in this high-density area. Traffic conditions in the immediate vicinity are relatively light, and the presence of security checkpoints further reduce the amount of vehicle traffic around this site. As such, vehicular access to the various uses in the building can and should be readily accommodated using existing roadways without the dedication of a separate and exclusive private drop off area. Further, the Commission notes that the inclusion of the private driveway precludes the ability to provide more generous and complying pedestrian circulation space around the development site. Trading valuable public space for private vehicular access is contrary to the DCP's goals for the Special Lower Manhattan District, which seeks to enhance the streetscape and pedestrian environment of Lower Manhattan. The Commission believes that the removal of the driveway would not only provide for a safer and more welcoming space for all users but allow more opportunities to increase the amount and quality of public spaces around the building.

The Commission notes that there is an existing temporary plaza at Site 5 known as the Albany Street Plaza, which opened for the public in 2014. Once construction begins on Site 5, the Albany Street Plaza will be removed. The Commission recognizes that the Albany Street Plaza was a temporary measure to activate the area as WTC development plans were established. However, in light of the removal of the temporary public plaza, the proposed significant reduction in required pedestrian circulation area and use of ground floor area as a private driveway is particularly concerning.

#### Second Floor Pedestrian Passageway and Liberty Park Connection

ESD is proposing the creation of additional public space within the building through a ground floor public lobby on Greenwich Street that connects to a second-floor passageway and bridge to Liberty Park. The passageway will also connect to elevators and stairs to the community facility on the third floor. The Commission notes that upper floor public spaces present unique challenges in being readily identifiable as public in nature and must provide sufficient reason for the public to leave the ground floor to access the spaces. The Commission understands that DCP staff encouraged ESD to enhance and modify the design of this passageway to create a more welcoming experience by adding amenities like benches, moveable tables and chairs, as well as programming and wayfinding to encourage public use. The Commission also acknowledges ESD's efforts to address DCP concerns on the second-floor passageway but urges ESD to go further in improving on its current design by adding elements to the public passage that will encourage the public to use and engage with the space.

Further, the Commission recommends that ESD rethink the bridge that connects Liberty Park and the second-floor public passageway. This bridge provides for an opportunity to create an even more attractive "front door" to transition from the park into Site 5. The Commission encourages ESD to explore opportunities to expand the public space on the second floor, by either widening the bridge itself to create more of a gathering space at this level that accommodates seating or other public amenities, or by expanding the corridor and converting the bridge area to an enclosed space that includes public seating, other amenities, and additional programming opportunities. The Commission notes that elimination of the private driveway would also provide opportunities to reimagine the interface between the building and Liberty Park. The enhancement of the second-floor passageway would ensure a stronger visual connection with Liberty Park and expand options in creating a welcoming and well used public space.

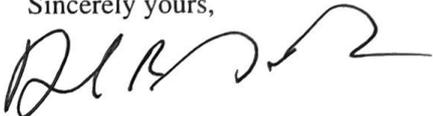
## Affordable Housing

The Commission acknowledges that the proposed inclusion of permanently affordable new housing on this site is crucial to the equitable and sustainable growth of the City and urges ESD to expand the amount of permanently affordable housing to the extent feasible. The affordable housing units should be distributed throughout the development. The Commission notes that vertical apartment distribution is a requirement to NYC's Mandatory Inclusionary Program (MIH) which serves as a model for affordable housing development across NYC and addresses inequity for renters of various economic backgrounds. The Commission understands the value of the addition of permanently affordable housing at this site and believes that's its critical to ensure that the affordable housing created result in quality units and promote equitable access to its residents of all economic backgrounds.

In summary, the Commission recommends its support and approval for most of the zoning overrides and the proposed building and site design. However, the Commission strongly recommends modifying the WTC GPP Phase II plan to exclude the waiver of the pedestrian circulation space and curb cut regulations, as well as redesigning the ground floor to prioritize the pedestrian experience through the removal of the driveway and instead, enhance the public realm in this culturally and historically significant area. Additionally, the Commission urges ESD to continue refining the design of the second-floor public passageway and bridge to Liberty Park to create a space that will be more welcoming and well used by the public.

The Commission encourages ESD to continue to work together with the State, the City, local community groups and the other stakeholders during the public comment period to incorporate their comments for Phase II of the proposed amendment into the final design of Site 5. The Commission recognizes ESD's ongoing dialogue with local community groups across lower Manhattan, some of which have voiced similar concerns over the reduction in public space, the driveway and the second-floor passageway. DCP and the City look forward to ESD's continued refinement and progress on the final proposal.

Sincerely yours,



Daniel R. Garodnick

cc: E. Hsu-Chen, S. Amron, E. Botsford, S. Johnson, J. Tepale

**From:** Jordan Barowitz <[REDACTED]>  
**Sent:** Monday, September 19, 2022 6:20 AM  
**To:** esd.sm.WTCSite5  
**Subject:** hearing testimony

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Testimony of Jordan Barowitz

Vice President of Public Affairs at The Durst Organization

ESD Public Hearing on World Trade Center Site 5

We are proud to support the proposal for a mixed income rental building on World Trade Center Site 5. As part owner, manager, and operator of One World Trade Center for the past decade we recognize that a diversity of uses and building typologies is essential to fulfilling the vision of the World Trade Center as a 24/7 live, work and play community.

We are privileged to have played a role in the transformation of the site from “Ground Zero” to a dynamic community that is fully integrated into the fabric of Lower Manhattan and New York City. The proposed mixed-income residential development, with its significant number of income restricted apartments, will give the site greater vitality and diversity and allow New Yorkers of all income levels to join the World Trade Center community.

**Jordan D. Barowitz**  
Vice President of Public Affairs



**The Durst Organization**  
One Bryant Park

Please  
consider  
the

New York, NY 10036



[www.durst.org](http://www.durst.org)

environment  
before  
printing  
this e-mail.

**From:** Erica Baum <[REDACTED]>  
**Sent:** Thursday, September 15, 2022 6:19 PM  
**To:** esd.sm.WTCSite5  
**Subject:** Speaking in support of 100%Affordable 5WTC

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To Whom it May Concern,

As a lifelong New York City resident and a longtime downtown resident I am writing in support of the alternative plan for this site proposed by the Coalition for 100% Affordable 5WTC. We witnessed the towers fall and my husband worked in the recovery efforts. He now participates in the medical monitoring supervised by Mt. Sinai for 9/11 survivors. I grew up in Mitchell Lama housing on the Upper West Side and I know first hand how valuable it is to communities to have public investment in affordable housing. MIH is a misguided approach and won't serve our communities. Adding 75 to 80% luxury housing does not create diversity it actually leads to displacement and further gentrification. New York City has a housing crisis and we have to create deeply affordable housing.

Lower Manhattan has lost a great amount of affordable housing and this is a unique opportunity for us to gain deeply and permanently affordable housing on public land. We don't need this site to be a profit making enterprise. This is public land using public funds. It should be an opportunity to generate the kind of diversity that we are losing.

The Coalition is asking for its alternative plan to be considered.

Please engage with the community and listen to public officials and dedicated residents who are asking for this.

Thank you,

Erica Baum

New York City

[REDACTED]

---

**From:** Samantha Day <[REDACTED]>  
**Sent:** Monday, October 17, 2022 10:45 PM  
**To:** esd.sm.WTCSite5  
**Subject:** Public Comment Submission 5WTC - Democratic Nominee for NYS 65 Grace Lee  
**Attachments:** Grace Lee\_5WTC Written Comment Submission .pdf

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To whom it may concern,

Please see attached for the written comment submission of the Democratic nominee for assembly district 65, Grace Lee.

Best,

Samantha

--

Samantha Day (she/her)  
Campaign Manager  
Grace Lee, Democratic Nominee for State Assembly, AD65  
[REDACTED]

Hello, my name is Grace Lee, I'm the Democratic Nominee for NYS Assembly in, neighboring, AD65 and I'm a longtime Lower Manhattan resident. I write regarding the currently proposed Phase 2 Amendments and requests of the Lower Manhattan Development Corporation, Empire State Development Corporation, and the Port Authority of New York & New Jersey to move forward on the proposed property transfers, lease authorizations, and other elements of the proposed Project Plan for the 5 World Trade Center site, as outlined in the Board Materials in the public comment process.

I am concerned that the requested approvals are premature given the ongoing discussion of increased affordability at the site, including the urging of the New York City Department of City Planning. New York is facing a housing crisis right now, with some two-bedroom apartments in Lower Manhattan renting for over \$6,000 per month and luxury units standing empty because no one can afford them. This is a once-in-a-lifetime opportunity to create affordable housing opportunities, specifically for September 11 survivors and their families, first responders, and seniors. The people who stayed in Lower Manhattan after the towers fell rebuilt this city, even as they developed cancer and other serious diseases, and now they are being priced out of their homes. Approval of the Phase 2 Amendments now would preclude the opportunity for material changes to the amount of affordable housing at the site and obstruct the ability to consider alternative financing mechanisms to increase affordability at the site in a meaningful way.

Currently, the agencies are reviewing an independent feasibility study by consultant Jerrold Delaine that would allow for greater affordability. Discussions are ongoing between the agencies, elected officials, and community representatives. Furthermore, our legislative and executive bodies need time to assess this feasibility and identify sources of funding to support this desperately needed affordable housing. As an incoming assemblymember, I join the many other local elected officials and community leaders who are calling for 5 World Trade Center to be 100 percent affordable housing.

Additionally, the disposal of any unused public funds at LMDC should be made transparent and publicly reviewed before any distribution is made. As previously requested, we argue believe these AC funds should be set aside for increased affordability at 5 World Trade Center.

As a result, I request that respective boards not proceed with the approval of the proposed plan and requested authorizations as currently proposed for the time being. There is no substitute for the symbolic value of making 5 World Trade Center 100 percent affordable. The community members who rebuilt this neighborhood deserve more than where they can't afford to live. They saved this neighborhood and deserve to stay in it, and what could be a greater living tribute to them than a place that they can call home? Thank you.

[REDACTED]

---

**From:** Jason Dubowski <[REDACTED]>  
**Sent:** Friday, October 7, 2022 10:56 PM  
**To:** esd.sm.WTCSite5  
**Subject:** With Support

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A note to make you aware of my support on the Proposed Amendment and Proposed Property Transfers, including the Essential Terms.

THank you  
JD

# Public Comment 5WTC -Comment period during Jewish Holidays

Jill Goodkind <[REDACTED]>

Mon 10/17/2022 4:50 PM

To: Public Comment <publiccomment@renewnyc.com>;

Cc: [REDACTED]; [REDACTED] <[REDACTED]>;  
[REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>;  
[REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>;  
[REDACTED] <[REDACTED]>;

Dear Board Members - I am extremely disappointed that LMDC and ESD scheduled the important public comment period to take place during the Jewish High Holidays, which includes Rosh Hashanah, Yom Kippur, Sukkot and Simcha Torah. In scheduling the comments during a time span that included four major Jewish holiday periods, the agencies showed great insensitivity and in effect created a much shortened period to read through the complicated materials, ask questions, get answers and submit comments. To at least in part remedy these unfortunate actions by the agencies, I request an extended comment period of at least 30 days. Sincerely, Jill Goodkind.

[REDACTED]; Co-Founder 100% Affordable 5 WTC; Member, NYS Democratic Committee; Public Member CB1

Cc: Rep. Jerrold Nadler

Sen. Chuck Schumer

State Sen. Brian Kavanagh

AM Yuh-Line Niou

AM Charles Fall

AM Deborah Glick

BP Mark Levine

CM Chris Marte

CB1 Chair Tammy Meltzer

[REDACTED]

---

**From:** Richard Corman <[REDACTED]>  
**Sent:** Monday, October 17, 2022 4:40 PM  
**To:** esd.sm.WTCSite5  
**Cc:** Brian Early  
**Subject:** Submission Regarding WTC Site 5  
**Attachments:** Phase 2 Amendment Letter ASM C Fall.pdf

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Hello

I submit the attached letter on behalf of Assemblymember Charles Fall.

Thank you.

Richard J Corman

[REDACTED]

To: Lower Manhattan Development Corporation  
Empire State Development Corporation

RE: World Trade Center Site 5 Phase 2 Amendments  
Date: October 17, 2022

I write regarding the currently proposed Phase 2 Amendments and requests of the Lower Manhattan Development Corporation, Empire State Development Corporation, and the Port Authority of New York & New Jersey to move forward on the proposed property transfers, lease authorizations, and other elements of the proposed Project Plan for the 5 World Trade Center site, as outlined in the Board Materials in the public comment process.

The concern is that the requested approvals are premature given the ongoing discussion of increased affordability at the site, including the urging of the New York City Department of City Planning. Such approvals would preclude the opportunity for material changes to the amount of affordable housing at the site and obstruct the ability to consider alternative financing mechanisms to increase affordability at the site in a meaningful way.

Currently, the agencies are reviewing an independent feasibility study by consultant Jerrold Delaine that would allow for greater affordability. Discussions are ongoing between the agencies, elected officials, and community representatives. Furthermore, our legislative and executive bodies need time to assess this feasibility and identify sources of funding to support this desperately needed affordable housing.

Additionally, the disposal of any unused public funds at LMDC should be made transparent and publicly reviewed before any distribution is made. As previously requested, we argue believe these AC funds should be set aside for increased affordability at 5 World Trade Center.

As a result, I request that respective boards not proceed with the approval of the proposed plan and requested authorizations as currently proposed for the time being.

Thank you.

Sincerely,

✓  
Chicks  
Fall



DEBORAH J. GLICK  
Assemblymember 66<sup>TH</sup> District  
New York County

THE ASSEMBLY  
STATE OF NEW YORK  
ALBANY

CHAIR  
Higher Education Committee  
Intern Committee

COMMITTEES  
Environmental Conservation  
Rules  
Ways & Means

**Comments of Assemblymember Deborah J. Glick Regarding the Proposed Amendment to the World Trade Center Memorial and Cultural Program General Project Plan and World Trade Center Memorial and Redevelopment Plan and Proposed Disposition of Property in Connection with Development of World Trade Center Site 5**

**October 14, 2022**

I have been the Assemblymember for District 66, which includes parts of Tribeca and the neighborhood surrounding the World Trade Center 5 (WTC 5) site, for over 30 years. In that time, I have witnessed the dramatic transformation of Tribeca from a commercial center whose few residents were largely working- and middle-class artists to a densely populated neighborhood made up largely of families and young professionals, many of whom are wealthy. This transformation has in part been fueled by government investment -- tax breaks and subsidies for the developers of luxury housing, sales of publicly-owned land to those same developers, and the redevelopment of the World Trade Center campus have fueled the revitalization of the neighborhood, but also the displacement of many of the residents who fought to make Tribeca a place New Yorkers would want to live and work, and who maintained the neighborhood in the aftermath of the September 11th attacks.

The WTC 5 site offers the state a unique opportunity to act as a corrective and develop a mixed-used building that includes permanently affordable residential units. The Empire State Development Corporation's (EDC) current proposal for the site, which includes the lease of WTC 5 to Brookfield Properties and Silverstein Properties to develop a luxury tower, would mandate that only 25% of the 1,200 apartments built would be affordable. This is simply unacceptable. I appreciate that the EDC has been engaged in sustained dialogue with community stakeholders about the potential to increase the affordability of the building; however, that dialogue has not produced any firm commitments to do so. In a neighborhood that is overrun with luxury housing, the use of public land to build apartments that include anything *but* affordable housing is an abdication of our responsibility to our constituents. Any residential development at the WTC 5 site should be 100% affordable.

The EDC and developers have argued that because of the high cost of construction in Tribeca, the additional tax subsidies that would be required to build a 100% affordable building at WTC 5 would be a misuse of public funds, which they state could go further in other areas of the city. This argument rings hollow. First, it neglects the fact that often the cost of land is a huge expense, and a barrier, to any public works project, and that in the case of WTC 5 the land is already owned and controlled by government agencies. Second, it posits that we should abandon our commitment to racial and socio-economic diversity based on the cost of construction - that because it is expensive to build in some areas, government should throw our hands up and say that rapid gentrification and the concentration of resources along racial lines is simply not our problem.

And third, it ignores that the EDC has historically found substantial funds to subsidize projects, even robbing those funds from the economically depressed neighborhoods they are meant to serve. For example, the EDC ensured that the Related Companies were able to raise over \$1.2 billion through the EB-5 visa program to fund the development of Hudson Yards. The EB-5 program allows immigrants to secure visas in exchange for large real estate investment in economically struggling areas, including those with high unemployment. This was a requirement the area around Hudson Yards does not meet. Rather than allow the funds to be saved for their intended use, the EDC engaged in financial gerrymandering so that unemployment numbers in census tracts including public housing in Harlem could be used to qualify the project, despite it offering no benefit to the same residents of those tracts. Examples like these leave many of us, myself included, hard-pressed to believe that the EDC could not identify adequate funding streams if they were invested in the goal of 100% affordability; or that we can trust that the funds in question will actually be used to build affordable housing elsewhere.

Tribeca is a resource-rich neighborhood. While its infrastructure has yet to catch up to its growth in population, the neighborhood offers access to a wealth of transportation options, beautiful open spaces, and high quality schools. It is exactly the kind of neighborhood where we should be investing in affordable housing, offering opportunity to all New Yorkers rather than reserving it for the rich. The concerns by those who have watched the racial and economic diversity in the neighborhood dwindle because of the pressures of the cost of living are real and well-placed, and the fact that many in the neighborhood, elected officials, and the Community Board have coalesced around the historic potential for this site is indicative of the importance of the choice that faces the EDC and the state. We have the chance to take a stand for the public goods that government should embody and promote -- opportunity, equity, and the use of government resources for all and not just the few. I implore you to support a 100% affordable WTC 5, and to only move forward with this proposed amendment and a proposed development with that commitment in place.

[REDACTED]

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**From:** Tracy Jackson <[REDACTED]>  
**Sent:** Monday, October 17, 2022 3:35 PM  
**To:** esd.sm.WTCSite5  
**Subject:** Testimony by Assemblymember Deborah Glick  
**Attachments:** AM Glick Testmony\_5 WTC Proposed Amendment and Property\_10.14.22.pdf

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*ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.*

Hello,

Attached, please find comments from Assemblymember Deborah Glick regarding the Proposed Amendment to the World Trade Center Memorial and Cultural Program General Project Plan and World Trade Center Memorial and Redevelopment Plan and Proposed Disposition of Property in Connection with Development of World Trade Center Site 5.

Please confirm receipt.

Thank you,

Tracy

Tracy Jackson  
Chief of Staff  
NYS Assemblymember Deborah J. Glick  
District 66

[REDACTED]

[Redacted]

**From:** Theodore Perez <[Redacted]>  
**Sent:** Monday, October 17, 2022 5:18 PM  
**To:** esd.sm.WTCSite5  
**Subject:** WTC Site 5 Proposed Amendment  
**Attachments:** AM Niou Public Comment Regarding Site 5.pdf

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*ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.*

Hello,

Attached is a comment from AM Niou regarding the WTC site 5 proposed amendment.

Thank you!

--

Best,

Theo Pérez  
Coordinator of Legislative and Community Affairs  
Assemblymember Yuh-Line Niou. 65th AD

[Redacted]

[Redacted]



**Assemblymember Yuh-Line Niou  
Public Comment on World Trade Center 5  
October 17, 2022**

Even after 21 years, our community in Lower Manhattan continues to feel the repercussions of 9/11. We have survivors and post 9/11 clean-up heroes who are just now developing health conditions. Many of us, including myself, have far too many friends or family who are terminally ill or have passed away due to 9/11 related illnesses.

In light of this tragic legacy, we cannot afford to squander public land and use government subsidies to fund a majority luxury development. Instead, this project can and must be one that is community-led and community-serving. This is public land and must be used for public good over private profit. Lower Manhattan is one of the least affordable neighborhoods in the nation, and it is clear that our community desperately needs good housing that is deeply and permanently affordable. The site should be used to serve this need.

The 100% Affordable 5 WTC coalition was formed to advocate for affordability. They have engaged architects, community leaders and local experts to consider what such a development would look like and commissioned a study that shows it is entirely feasible for a fully affordable tower to be built on this site. The currently proposed luxury tower is an unacceptable waste of a tremendous opportunity. Our city and state must rise to the occasion and join the coalition to create the fully affordable

development that working families, including 9/11 survivors and their descendants, deserve.

In addition to deeply and permanently affordable housing, the WTC 5 project should allocate more public space for community use. Our neighborhood severely lacks recreation areas, gathering hubs, and vital family spaces. We should also look into how retail space at the site can cater to the needs of residents such as grocery stores and small businesses, rather than luxury chains.

The transfer proposal sets minimum affordability requirements far below what a public site ought to have and outlines a conditional project that does not guarantee the resources that the neighborhood needs. With conversations about this project still ongoing, I urge ESD to continue working with our coalition, relevant agencies, and elected officials and only to accept a project that prioritizes our community first and to make the needs of working families and 9/11 survivors, the chief priority of this project.

# Public Comment on Proposal for 5WTC

Mariama James <[REDACTED]>

Mon 10/17/2022 5:51 PM

To: Public Comment <publiccomment@renewnyc.com>;

Dear Board Members:

I am a District Leader in Assembly District 65 Part C in Lower Manhattan and a founder of the Coalition for 100% Affordable 5WTC (the “Coalition”). I urge the Lower Manhattan Development Corporation, Empire State Development Corporation, and the Port Authority of New York & New Jersey (collectively, the “Agencies”) not to move forward on the proposed property transfers, lease authorizations, and other elements of the proposed Project Plan for the 5 World Trade Center site, as outlined in the Board Materials in the public comment process. The current proposal could hinder further meaningful and fruitful conversations to increase the number of affordable units at the site.

The Coalition has had productive conversations with the Agencies as well as other members of the current Governor’s administration, all of whom have shown sincere interest in our proposal. An independent feasibility study commissioned by the Coalition shows that we can greatly reduce the need for subsidies. Additionally, all of our local elected officials have expressed support for a fully affordable building at site 5 of the World Trade Center.

I believe that the Agencies have been engaging with us in good faith, thus binding the Agencies to the current proposal would create unnecessary obstacles – both procedurally and legally – and could potentially preclude any increase in the affordable units for the site. Therefore, I respectfully request that the respective boards not proceed with the approval of the currently proposed Phase 2 Amendments to the General Project Plan for the World Trade Center.

Kind regards,

Mariama James

[REDACTED]

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**From:** Emily Leng <[REDACTED]>  
**Sent:** Thursday, September 15, 2022 6:19 PM  
**To:** esd.sm.WTCSite5  
**Subject:** Senator Kavanagh's Public Comment on 5WTC  
**Attachments:** 2022.09.15 -- Public Comment on 5WTC Proposed Project.pdf

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*ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.*

Hello,

Attached please find the written public comments of State Senator Brian Kavanagh on the proposed amendment to the WTC Memorial and Cultural Program GPP and the proposed disposition of property in connection with development at WTC Site 5.

Please feel free to reach out with any comments or questions.

Best,

--

**Emily Leng**

[REDACTED]  
Community Liaison  
Office of State Senator Brian Kavanagh



**BRIAN KAVANAGH**  
SENATOR, 26TH DISTRICT

**THE SENATE**  
**STATE OF NEW YORK**

**CHAIR**  
HOUSING, CONSTRUCTION &  
COMMUNITY DEVELOPMENT

**COMMITTEES**

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SOCIAL SERVICES

**Lower Manhattan Development Corporation**  
**Empire State Development Corporation**

**Virtual Public Hearing on the Proposed Amendment to the World Trade Center Memorial  
and Cultural Program General Project Plan and World Trade Center Memorial and  
Redevelopment Plan and Proposed Disposition of Property in Connection with  
Development of World Trade Center Site 5**

**Comments of State Senator Brian Kavanagh**

**September 15, 2022**

I submit for your consideration the following comments regarding the proposal of the Lower Manhattan Development Corporation (LMDC) and the Empire State Development Corporation (ESD) to amend the World Trade Center Memorial and Cultural Program General Project Plan (GPP) and the proposed disposition of property in connection with development at World Trade Center Site 5.

To begin, I want to express my support for a mixed-use development at Site 5 with residential and community facility uses. I believe that a mixed-use residential tower at this site would be an appropriate addition to the Lower Manhattan community, most especially to the extent it provides for affordable housing.

I recognize that the current proposed development provides for 25% of the residential units to be permanently affordable at an average income of roughly 50% of the area median income. As you know, over the past year or so, many of my colleagues, community advocates, and I have welcomed the inclusion of these affordable homes in the project -- and I acknowledge that 50% of AMI is a fairly generous standard of affordability for a project of this type -- but we have also strongly expressed the view that 25% is not enough, especially for a community that has been losing affordable apartments at an alarming rate for many years. I want to publicly recognize that throughout 2022, representatives of LMDC, ESD, the Port Authority, and other State officials have participated in ongoing discussions, hosted by my office -- with the Community Board, the offices of Congressman Nadler, Borough President Levine, Assemblymember Niou, Councilmember Marte, and the Coalition for a 100% Affordable 5WTC -- to discuss the feasibility of increasing affordability at the site. I appreciate your participation in these

conversations and your commitments to working with us on this, and I want to stress again that maximizing affordability must be a key priority, and I strongly urge you to continue these conversations and make every effort to consider various financing sources and other measures to ensure a maximum number of permanently affordable units.

The proposed project also provides for space in the tower for a community facility. In the two potential programs analyzed in the mixed-use design guidelines, the community facility space is set at either 13,000 gsf or 21,329 gsf. Both the Community Board and other stakeholders in the community have advocated strongly for a larger community space, given that this area currently lacks sufficient accessible and multi-purpose public community spaces, especially dedicated senior spaces and recreational areas for students and children. I urge you to increase the community facility space designated in the final project proposal to the greatest extent feasible, in order to ensure that residents of this increasingly mixed-use neighborhood are able to enjoy a diverse and abundant range of much-needed programming.

Finally, with regards to the sustainability standards, I recognize that the current guidelines state that the building must meet LEED Gold standards and comply with the Sustainable Design Guidelines applicable to a mixed-use building. As I have expressed to you before, I believe that these standards should be considered baseline requirements, and I ask that you implement additional sustainability guidelines that go beyond what is currently proposed. In particular, recognizing that the Governor in her 2022 State of the State address, legislators in the form of the proposed All-Electric Building Act (S6843A/A8431 Kavanagh/Gallagher), and the State bodies working on implementation of the Climate Leadership and Community Protection Act have all proposed requiring all new buildings to be all-electric to the extent feasible, I ask that the sustainability standards include this objective.

As I have noted before, this site is one that holds significant meaning to many who live and work in the area, and is a rare opportunity to bring both large-scale affordable housing and community space to Lower Manhattan. A community-centered approach here is key, and I urge you all to continue to work diligently with all partners in the community to design a building that will foster the diversity and vibrancy of this neighborhood.

I appreciate your consideration of these comments.



[REDACTED]

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**From:** Steven Schall <[REDACTED]>  
**Sent:** Sunday, October 16, 2022 8:55 PM  
**To:** esd.sm.WTCSite5  
**Subject:** Affordable housing for WTC Site 5

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ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Dear Empire State Development,

As a homeowner in Tribeca since 1992, I write to you to express my concerns and desires as you move forward with development of WTC Site 5.

I sincerely hope that in the WTC Site 5 Proposed Amendment you increase SUBSTANTIALLY the percentage of affordable housing that will be reserved at the site and make sure that any retail is also both practical and affordable for downtown residents.

Respectfully,

Steven Schall  
[REDACTED]

## 5WTC - Public Comment



Vittoria NYC <[redacted]>

Thu 9/15, 4:12 PM

Public Comment

Reply all |

9 15 22 Public Hearing

I am Vittoria Fariello. I am a district leader in Lower Manhattan and a member of the Coalition for 100% Affordable 5WTC.

The 5WTC site sits in a resource-rich neighborhood. It is a walk away from gorgeous parks, excellent schools, a transportation hub, jobs on Wall Street and our Civic Center. There simply is no better place to give residents access to resources that they would not otherwise have because they could not afford to live in this neighborhood.

This is our last opportunity to give back to 9/11 survivors and first responders who sacrificed so much to help bring back our city after the horrific terrorist attacks of September 11. Survivors were told it was safe to be here and now suffer terrible diseases attributed to the air they breathed after 9/11 despite being told it was safe to come home. This includes our neighbors in Chinatown, the Lower East Side and NYCHA who stayed and helped rebuild the City where they are now being priced out. A fully affordable building at 5WTC would honor their contributions.

The Coalition has commissioned a study by Pratt Institute Prof. Jerrod Delaine which shows that there is a path to making 5WTC 100% affordable. There are resources and financial instruments that can make this happen. It really comes down to one thing: having the political will.

We should not allow bureaucratic deadlines to preclude our ability to provide desperately needed affordable housing for our people. Housing New Yorkers is more important than meeting an arbitrary deadline. I hope you will proceed only with a plan that provides 100% affordable housing.

Thank you for your time.

Kindly,  
[Vittoria Fariello](#)

Vittoria Fariello

Democratic District Leader  
[redacted]  
[redacted]  
[redacted]

"It always seems impossible until it is done."  
- Nelson Mandela



# Public Comment on Proposal for 5WTC

[Redacted]

Mon 10/17/2022 1:50 PM

To: Public Comment <publiccomment@renewnyc.com>;

📎 1 attachments (151 KB)

2022-10-17 Public Comment - Fariello Vittoria.pdf;

Dear Board Members:

I am a Democratic District Leader in Lower Manhattan and a member of the Coalition for 100% Affordable 5WTC. I attach my comment to this email. For your convenience, I include the text below my signatures.

Thank you for this opportunity.

Kindly,  
Vittoria

[Redacted Signature]



[www.vittorianyc.com](http://www.vittorianyc.com)

“It always seems impossible until it is done.”  
• Nelson Mandela

Dear Board Members:

I am a District Leader in Assembly District 61 in Lower Manhattan and a member of the Coalition for 100% Affordable 5WTC (the “Coalition”). I urge the Lower Manhattan Development Corporation, Empire State Development Corporation, and the Port Authority of New York & New Jersey (collectively, the “Agencies”) not to move forward on the proposed property transfers, lease authorizations, and other elements of the proposed Project Plan for the 5 World Trade Center site, as outlined in the Board Materials in the public comment process. The current proposal could hinder further meaningful and fruitful conversations to increase the number of affordable units at the site.

The Coalition has had productive conversations with the Agencies as well as other members of the current Governor's administration, all of whom have shown sincere interest in our proposal. An independent feasibility study commissioned by the Coalition shows that we can greatly reduce the need for subsidies. Additionally, all of our local elected officials have expressed support for a fully affordable building at site 5 of the World Trade Center.

I believe that the Agencies have been engaging with us in good faith, thus binding the Agencies to the current proposal would create unnecessary obstacles – both procedurally and legally – and could potentially preclude any increase in the affordable units for the site. Therefore, I respectfully request that the respective boards not proceed with the approval of the currently proposed Phase 2 Amendments to the General Project Plan for the World Trade Center.

Kind regards,

Vittoria Fariello



Dear Board Members:

I am a District Leader in Assembly District 61 in Lower Manhattan and a member of the Coalition for 100% Affordable 5WTC (the “Coalition”). I urge the Lower Manhattan Development Corporation, Empire State Development Corporation, and the Port Authority of New York & New Jersey (collectively, the “Agencies”) not to move forward on the proposed property transfers, lease authorizations, and other elements of the proposed Project Plan for the 5 World Trade Center site, as outlined in the Board Materials in the public comment process. The current proposal could hinder further meaningful and fruitful conversations to increase the number of affordable units at the site.

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Kind regards,

Vittoria Fariello